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8 *Attorneys for Plaintiff METROPOLITAN LIFE
INSURANCE COMPANY*

9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO DIVISION

13
14 METROPOLITAN LIFE INSURANCE
COMPANY, a New York corporation,
15 Plaintiff,

16 v.
17 ACDF, LLC, a California limited liability
company, as successor by merger to 104
PARTNERS, LLC; WILLOW AVENUE
INVESTMENTS, LLC, a California limited
liability company; ASHLAN & HAYES
INVESTMENTS, LLC, a California limited
liability company; GRANTOR FRESNO
CLOVIS INVESTMENTS, LLC, a California
limited liability company; MARICOPA
ORCHARDS, LLC, a California limited
liability company; FARID ASSEMI, an
individual; FARSHID ASSEMI, an individual;
DARIUS ASSEMI, an individual; and DOES 1
through 100, inclusive,

25 Defendants.

18 Case No. 1:24-cv-01261-KES-SAB

19 **STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

20 (Local Rule 144)

21 Action Filed: October 16, 2024
Trial Date: Not Set

1 **STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT**

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3 Plaintiff METROPOLITAN LIFE INSURANCE COMPANY (“Plaintiff”), and
4 Defendants ACDF, LLC, as successor by merger to 104 PARTNERS, LLC, WILLOW AVENUE
5 INVESTMENTS, LLC and MARICOPA ORCHARDS, LLC (collectively “Defendants”) by and
6 through their counsel, represent and stipulate as follows:

7 1. The above-captioned action was commenced on October 16, 2024. Dkt. No. 1.

8 2. On October 17, 2024, counsel for Plaintiff and Defendants met and conferred
9 regarding the pending action. Counsel for Plaintiff requested that Defendants waive or
10 acknowledge service under Federal Rule of Civil Procedure 4(d).

11 3. Counsel for Defendants represented that Defendants would acknowledge service
12 and requested additional time to file a response to the Complaint, up to and including December
13 16, 2024. Counsel for Defendants will execute waivers of service of summons acknowledgment
14 and Plaintiff will promptly file the waivers with the Court. Defendants will file a response to the
15 Complaint by no later than December 16, 2024 regardless of the date of the waiver is signed.

16 Now therefore, Plaintiff and Defendants stipulate under Local Rule 144(a) that the
17 deadline to file a response to the Complaint shall be December 16, 2024.

18 DATED: October 24, 2024

19 STOEL RIVES LLP

20 /s/ Thomas A. Woods
21 MICHAEL B. BROWN, Bar No. 179222
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28 *Attorneys for Plaintiff*
 METROPOLITAN LIFE INSURANCE
 COMPANY

1 DATED: October 24, 2024

MCDERMOTT WILL & EMERY LLP

2 /s/ Robert Barton (as authorized on October 23, 2024)
3 ROBERT BARTON, Bar No. 269455

4 *Attorneys for Defendants*
5 ACDF, LLC, WILLOW AVENUE
6 INVESTMENTS, LLC and MARICOPA
7 ORCHARDS, LLC

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